

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re ) Chapter 11  
CIRCUIT CITY STORES, INC., et al., ) Case No. 08-35653 (KRH)  
Debtors. )  
            )

**REQUEST FOR SPECIAL NOTICE, SERVICE OF PAPERS  
AND RESERVATION OF RIGHTS**

**TO THE CLERK OF THE COURT AND TO ALL INTERESTED PARTIES:**

**PLEASE TAKE NOTICE** that pursuant to Rules 2002, 3017, 4001, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, **Eagleridge Associates, LLC, Torrance Towne Center Associates, LLC, NMC Stratford, LLC and FJL-MVP, LLC** request that notice of all matters in the bove-captioned case which require notice to creditors, or to other parties in interest including, without limitation, all notices and papers referred to in Federal Rules of Bankruptcy Procedure 2002, 4001 and 9007, and additionally including, without limitation, copies of any orders, applications, and notices thereof, complaints, demands, hearings, motions, petitions, pleadings or requests (whether for relief from stay, adequate protection, or any other documents relating to adversary proceedings or otherwise), any other documents brought before the Court in these cases, whether formal or informal, and notices thereof, complaints, demands, hearings, motions, petitions, pleadings or requests (whether for relief from stay, adequate protection, or any other documents relating to adversary proceedings or otherwise), any other documents brought before the Court in these cases, whether formal or informal, and other matters, whether written or oral, and whether transmitted or conveyed by mail, delivery, facsimile, telephone or otherwise, be sent

to counsel for **Eagleridge Associates, LLC, Torrance Towne Center Associates, LLC, NMC Stratford, LLC and FJL-MVP, LLC** as follows:

Ian S. Landsberg, Esq.  
Landsberg Margulies LLP  
16030 Ventura Boulevard, Suite 470  
Encino, California 91436  
Telephone: (818) 705-2777  
Facsimile: (818) 705-3777

Request is made that the Clerk of the Court and all parties in interest to which this Request for Special Notice is being mailed, place the foregoing name and address on any mailing matrix or list of creditors to be prepared or existing in this proceeding. Neither this Request for Notice nor any subsequent appearance, pleading, claim, proof of claim, document, suit, motion nor any other writing or conduct, shall constitute a waiver of **Eagleridge Associates, LLC, Torrance Towne Center Associates, LLC, NMC Stratford, LLC and FJL-MVP, LLC**:

- (a) Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court;
- (b) Right to a trial by jury in any case, controversy or proceeding as to any and all matters so triable, notwithstanding the designation *vel non* of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2), and regardless of whether such jury trial is pursuant to statute or the United States Constitution;
- (c) Right to have the reference withdrawn by the United States District Court in any manner or Proceeding subject to mandatory or discretionary withdrawal; and
- (d) Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which **Eagleridge Associates, LLC, Torrance Towne Center Associates, LLC, NMC Stratford, LLC and FJL-MVP, LLC** are entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved by **Eagleridge Associates, LLC, Torrance Towne Center Associates, LLC, NMC Stratford, LLC and FJL-MVP, LLC** without exception, and without conceding jurisdiction in any way by this filing or by any other participation in this bankruptcy case.

Dated: November 21, 2008

**LANDSBERG MARGULIES LLP**

By: /s/ Ian S. Landsberg  
Ian S. Landsberg  
Landsberg Margulies LLP  
16030 Ventura Boulevard, Suite 470  
Encino, California 91436  
Telephone: (818) 705-2777  
Facsimile: (818) 705-3777

Attorneys for **Eagleridge Associates, LLC, Torrance Towne Center Associates, LLC, NMC Stratford, LLC and FJL-MVP, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2008, a true and correct copy of the foregoing document was served by (1) the United States first class mail, postage prepaid, on the parties listed below; and (2) by e-mail on the parties who receive electronic notice in this case pursuant to the Court's ECF filing system.

/s/ *Rebecca Benitez*

Rebeca Benitez

Dion Hayes  
Douglas M. Foley  
Joesph S. Sheerin  
McGuireWoods LLP  
One James Center  
901 E. Cary Street  
Richmond, VA 23219

Gregg M. Galardi  
Ian S. Fredericks  
Skadden, Arps, Slate, Meagher & Flom, LLP  
One Rodney Square  
P.O. Box 636  
Wilmington, DE 19899-0636

Chris L. Dickerson  
Skadden, Arps, Slate, Meagher & Flom, LLP  
333 West Wacker Drive  
Chicago, IL 60606

Ronald M. Tucker  
Simon Property Group, Inc.  
225 West Washington Street  
Indianapolis, IN 46204

W. Clarkson McDow, Jr.  
Office of the United States Trustee  
701 E. Broad Street, Suite 4304  
Richmond, VA 23219